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| CLERK US DISTRICT COURT DISTRICT OF NEVADA | |
| BY: _____ | DEPUTY _____ |

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

COMMODITY FUTURES TRADING COMMISSION,

Plaintiff,

v.

DAVID GILBERT SAFFRON
 a/k/a DAVID GILBERT and
 CIRCLE SOCIETY, CORP.,

Defendant.

Case No. 2:19-cv-1697-JAD-DJA

PLAINTIFF'S MOTION TO UNSEAL
CASE NO. 2:19-CV-1697-JAD-DJA

Pursuant to Local Rule IA 10-5(a), Plaintiff Commodity Futures Trading Commission ("Commission" or "CFTC") moved this Court for an order temporarily sealing this new civil action on September 30, 2019 (ECF No. 2). The CFTC asked that its new civil action be sealed until the earlier of (1) two weeks following issuance of the requested *ex parte* temporary restraining order ("TRO"); or (2) Saffron is served. For good cause shown, this Court granted the CFTC's motion to temporarily seal the case (Order, ECF No. 9) and entered the TRO on October 3, 2019 (Order, ECF No. 9).

The CFTC now asks the Court to unseal the case because the seal is no longer necessary now that the Summons, Complaint, TRO, Motion for Preliminary Injunction, all other initial filings, and the Order have been served on Defendant Circle Society, Corp. *See* Affidavit of

1 Service and supporting exhibits, ECF No. 10 (showing service was effected on Defendant Circle
2 Society, Corp. as of October 8, 2019). Although the CFTC has not yet been able to formally
3 serve Defendant David Gilbert Saffron ("Saffron"), there is reason to believe that Saffron is
4 aware of this civil action and October 3, 2019 Order. Following the CFTC's court filings on
5 September 30, 2019, many individuals have contacted the CFTC regarding this matter and their
6 investments with Defendants. Therefore, the CFTC respectfully requests that the seal placed
7 over this case be lifted.

8
9 Dated: October 11, 2019

Respectfully submitted,

By: 

Danielle E. Karst

Timothy J. Mulreany

COMMODITY FUTURES TRADING

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

COMMODITY FUTURES TRADING
COMMISSION,

Plaintiff,

v.

DAVID GILBERT SAFFRON
a/k/a DAVID GILBERT and
CIRCLE SOCIETY, CORP.,

Defendants.

Case No. 2:19-cv-1697-JAD-DJA

[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION TO UNSEAL CASE

Plaintiff Commodity Futures Trading Commission filed the above-captioned matter on September 30, 2019 under seal pursuant to Local Rule IA 10-5(a). Plaintiff now asks the Court to unseal the case because the seal is no longer necessary.

With good cause shown, Plaintiff's Motion to Unseal is hereby GRANTED. The Clerk shall make all documents filed previously with the Court in this matter part of the public record. Plaintiff shall serve a copy of this Order and its Motion on all parties forthwith.

IT SO ORDERED:

UNITED STATES DISTRICT JUDGE

DATED: _____